

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF FLORIDA

FELIPE THOMAS Y DE LA GANDARA a/k/a CASE NO.: 2:25-CV-02242-FB-JMV
FELIPE THOMAS Y DE LA GANDARA,
5TH MARQUES DE IVANREY.;

Plaintiff,

v.

MARCO ANTONIO SORIANO;

Defendants.

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO
PLAINTIFFS FIRST AMENDED COMPLAINT**

Defendant, Marco Antonio Soriano (“Defendant”), hereby file this Unopposed Motion for Extension of Time to Respond to Plaintiffs’ Felipe Thomas y De La Gandara a/k/a Felipe Thomas y De La Gandara, 5th Marques De Ivanrey (“Plaintiffs”) First Amended Complaint against Mr. Soriano **ECF No. 16**, and in support thereof state as follows:

1. On November 21, 2025, Plaintiffs filed their First Amended Complaint against Mr. Soriano **ECF No. 16** (the “Motion”).
2. Defendant’s response to the Amended Complaint is currently due on December 5, 2025.
3. Earlier today, the parties participated in mediation in an effort to resolve the matter. Meaningful discussions took place, and the parties intend to continue settlement communication over the coming weeks.
4. In light of the ongoing settlement discussions, and to allow sufficient time to prepare a substantive response should settlement not be reached, Defendant respectfully requests an extension of time through January 15, 2026, to respond to the Amended Complaint.
5. Opposing counsel consents to the requested extension.



6. This Motion is made in good faith and not for the purpose of delay.

7. No party will be prejudiced by the granting of the requested extension.

WHEREFORE, Defendant Marco Antonio Soriano respectfully requests that this Court grant this Unopposed Motion, extend the deadline to respond to the First Amended Complaint through January 15, 2026, and grant such other relief as the Court deems just and proper.

Dated: December 5, 2025.

CERTIFICATE OF CONFERRAL

Pursuant to Local Rule 7.1(a)(3), the undersigned counsel hereby certifies that on December 5, 2025, counsel for Defendant conferred with counsel for Plaintiffs regarding the relief sought in this Motion. Plaintiffs' counsel does not object to the relief requested herein.

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BARAKAT
+ BOSSA

Respectfully submitted,

BARAKAT + BOSSA, PLLC

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on December 5, 2025, I electronically filed the foregoing with the Clerk of the Court using CM/ECF. Copies of the foregoing document will be served on all counsel of records via transmission of Notice of Electronic Filing generated by CM/ECF.

By: /s/ Giacomo Bossa

GIACOMO BOSSA



BARAKAT
+ BOSSA